

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:	§	
	§	
DHILLON GROUP, LLC	§	CASE NO. 12-40163-BTR-11
	§	
DEBTOR.	§	

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**JOINDER IN JAGMOHAN DHILLON'S OBJECTION TO MOTION TO  
SHORTEN EXCLUSIVITY PERIOD AND PERMIT THE FILING OF  
MOVANT'S COMPETING PLAN OF REORGANIZATION AND  
DISCLOSURE STATEMENT; TO MODIFY ORDER ISSUED ON MAY 9,  
2012; AND TO SHORTEN TIME FOR HEARING ON MOVANT'S  
DISCLOSURE STATEMENT (RE: DOCKET NO. 113)**

TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

Dhillon Group, LLC ("Debtor"), the debtor in the above-styled and numbered bankruptcy case, files this *Joinder in Jagmohan Dhillon's Objection to Motion to Shorten Exclusivity Period and Permit the Filing of Movant's Competing Plan of Reorganization and Disclosure Statement; to Modify Order Issued on May 9, 2012; and to Shorten Time for Hearing on Movant's Disclosure Statement* (Docket No. 113) (the "Motion") and in support thereof would show the Court the following.

**JOINDER**

1. Debtor joins in the Objection filed by Jagmohan Dhillon in opposition to the Motion and also the objections of United Central Bank.
2. Debtor filed its First Amended Plan of Reorganization and Disclosure Statement on April 26, 2012. [Docket #103 and #104] The Order Approving Debtor's First Amended Disclosure Statement and Setting Hearing on Confirmation of Debtor's First Amended Plan of Reorganization was signed by this Court on April 30, 2012. [Docket #107] The Confirmation hearing is set for June 4, 2012. [Docket #107] The Debtor has moved with all due haste to keep

this case moving and to obtain approval of disclosure statement.

3. The stay has also been modified to allow United Central Bank to post the Debtor's property for a foreclosure sale in June 2012. [Docket #111] UCB has posted the property for a June 2012 foreclosure sale. The Debtor must confirm its Plan on June 4, 2012.

4. There is simply no way another plan can be proposed in this case at this late date, a disclosure statement approved and a confirmation hearing set and held that will not violate the terms of the existing orders in this case. [Docket #111] There is no basis for relief from the prior orders in this case. Trying to get a plan approved at this late date by a competing party is legally impossible. There is no way to meet all the deadlines for confirmation and the Debtor has moved forward on its Plan within its exclusive period.

WHEREFORE, PREMISES CONSIDERED Dhillon Group, LLC respectfully requests that the Court deny the Motion. Dhillon Group, LLC requests such other and further relief to which it may be entitled at law or in equity.

Dated: May 28, 2012

Respectfully submitted,

/s/ Joyce Lindauer

By: Joyce W. Lindauer,

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COUNSEL FOR DEBTOR

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served upon all registered ECF users in this case on May 28, 2012.

/s/ Joyce Lindauer  
Joyce Lindauer

Label Matrix for local noticing  
0540-4  
Case 12-41063  
Eastern District of Texas  
Sherman  
Mon May 28 13:58:13 CDT 2012

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P. O. Box 12548  
Austin, TX 78711-2548

Bank Of America  
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4161 Piedmont Pkwy.  
Greensboro, NC 27410-8110

Bank of America  
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El Paso, TX 79998-2235

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Kansas City, MO 64195-0507

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CAROL STREAM IL 60197-5213

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

HSBC/Best Buy  
P.O. Box 15519  
Wilmington, DE 19850

Internal Revenue Service  
Centralized Insolvency Operation  
P. O. Box 21126  
Philadelphia, PA 19114

End of Label Matrix	
Mailable recipients	24
Bypassed recipients	0
Total	24